

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES, LLC,

Defendant.

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Robert Roman,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04292 (SMB)

**DECLARATION OF MAXIMILLIAN S. SHIFRIN IN SUPPORT OF
THE TRUSTEE'S MOTION TO COMPEL**

MAXIMILLIAN S. SHIFRIN hereby declares as follows:

1. I am a member of the New York Bar and an associate at Baker & Hostetler LLP, counsel for plaintiff Irving H. Picard, as trustee (the "Trustee") for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the estate of Bernard L. Madoff.

2. As an attorney of record in these proceedings, I am fully familiar with the facts set forth herein based either upon my own personal knowledge or upon information conveyed to me by colleagues that I believe to be true.

3. Attached hereto as **Exhibit A** is a true and correct copy of the Trustee's Request for Production, dated October 19, 2016.

4. Attached hereto as **Exhibit B** is a true and correct copy of the Trustee's Interrogatories, dated October 19, 2016.

5. Attached hereto as **Exhibit C** is a true and correct copy of Defendant's Responses and Objections to the Trustee's Requests for Production, dated December 19, 2016.

6. Attached hereto as **Exhibit D** is a true and correct copy of Defendant's Responses and Objections to the Trustee's Interrogatories, dated December 19, 2016.

7. Attached hereto as **Exhibit E** is a true and correct copy of the transcript of Defendant's deposition, dated May 17, 2017.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing statements made by me are true and correct.

Dated: New York, New York
June 14, 2017

/s/ Maximillian S. Shifrin
Maximillian S. Shifrin